

REMARKS

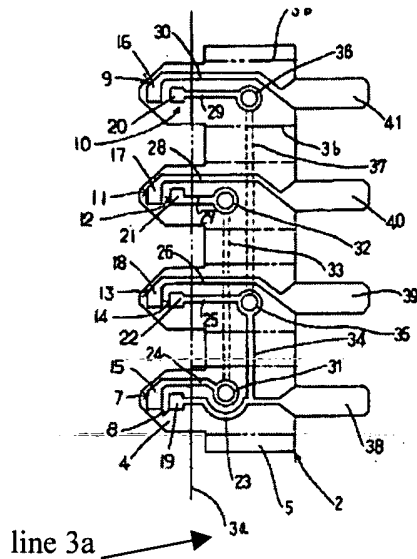
Applicant acknowledges with appreciation that Claims 21-23 and 28-30 are allowed and that Claims 3 and 12-14 are allowable if rewritten in independent form.

Claims 1, 11, 24, and 25 were rejected under 35 U.S.C. 102(b) as being anticipated by *Nakayama Kiyoharu* ("Kiyoharu" Japanese Patent Document 06-310763). Applicant respectfully traverses.

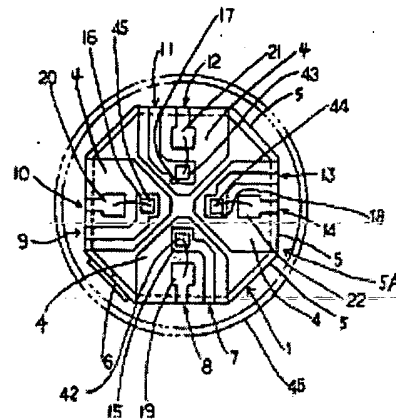
The present invention teaches a light-emitting unit including a flat polygonal member, a light emitting member, and at least three sets of terminals disposed each on a different side of a periphery of the polygonal member so that the light-emitting unit may be used to realize a variety of shapes of both flat and solid appearance (Application page 2 ll. 9-12 and 23-25). A plurality of light-emitting units may be assembled to construct these shapes while the terminals on the periphery of the polygonal members are used to conduct power to the light-emitting elements of adjacent light-emitting units (Application page 4 ll. 16-20). The corresponding terminals on sides of joined light-emitting units are electrically connected in order to conduct power from a feeder terminal to one or more adjacent light-emitting units connected in parallel (Application page 4 ll. 22-24).

Kiyoharu teaches a plurality of light-emitting diode (LED) elements mounted on tabs extending from a flexible substrate composed of a polyimide resin as shown in Fig. 3, reproduced below and described in Kiyoharu paragraph [0006]. The flexible substrate is rolled along its long axis into a cylindrical structure and the tabs are bent at about line 3a towards the center of the cylinder to each form a portion of a flat surface at a first end of the cylindrical structure as shown in Fig. 1, reproduced below. Applicant respectfully submits that what may

appear to be a flat polygonal member in Fig. 1, as described in the present rejection, is actually an end-view of the bended tabs of a flexible substrate as described.



Kiyoharu Fig. 3



Kiyoharu Fig. 1

The first end of the cylindrical structure with the piece-wise flat surface carrying the LED elements is encased in a translucent resin as described in Kiyoharu paragraph [0010]. This translucent resin conducts light away from the energized LED elements while providing electrical insulation from any adjacent elements. This is contrary to the present invention that teaches a plurality of light-emitting units that can be electrically interconnected on adjacent sides of the light-emitting units.

The Office action describes "at least three sets of terminals (7-14), each set of terminals being provided on a different side of a periphery of the polygonal member". Applicant respectfully submits that components 7-14 are not terminals but rather are portions of the conducting elements on the flexible substrate that extend beyond the bending line 3a as shown in Fig. 3 above. The conducting elements are not terminals on the periphery of a flat polygonal member as in Claims 1, 11, and 24. The terminals on the periphery of the flat polygonal member

of the present invention are for electrically connecting to adjacent light-emitting units or a power feeder terminal (Application page 4 ll. 22-24). The terminals (38, 39, 40, 41) described in Kiyoharu are actually located together on the second end of the cylindrical structure, away from the LEDs on the first end as shown in Fig. 3 above, in order to permit connection of the second end of the cylindrical structure to a circuit board or other planar member. Claim 25 depends from and further limits independent Claim 24.

Claim 11 relates to at least two light-emitting units that can be electrically connected on facing sides. While Kiyoharu does teach a plurality of LED elements in a single light emitting diode lamp unit, Kiyoharu does not teach or suggest placing this single light emitting diode lamp unit adjacent to other lamp units in order to form an interconnected structure as in Claim 11.

Applicant respectfully requests this rejection be withdrawn.

Claims 2, 26, and 27 were rejected under 35 U.S.C. 103(a) as being unpatentable over Kiyoharu. Applicant respectfully traverses.

As discussed in reference to Claims 1, 11, 24, and 25, Kiyoharu does not teach or suggest placement of the terminals on different sides of the periphery of the polygonal member as claimed. Claim 2 depends from independent Claim 1, and is believed to be patentable based on the above arguments.

Claim 26 includes the sets of terminals on the periphery of the polygonal member and further comprises a light scatterer such as a Fresnel lens (Application Figs. 1-2 and page 16 line 24 to page 17 line 5). The light scatterer can be a resin material that both protects the structure of the light-emitting unit while projecting light in a direction normal to the surface of the

polygonal member. Claim 27 depends from and further limits independent Claim 26. Claim 27 is amended to correct a typographical error (Application page 21 ll. 5-12).

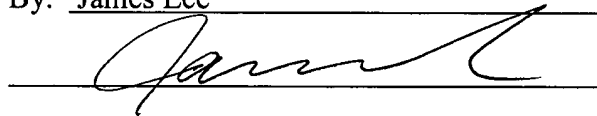
Applicant respectfully requests this rejection be withdrawn.

New claims 31-32 are believed to be patentable based on the following. Claim 31 defines a light-emitting member as including a Fresnel lens (Application Figs. 1-2 and page 16 line 24 to page 17 line 5). Claim 32 states that the corresponding terminals from each set of terminals are electrically connected (Application Fig. 5A and page 24 ll. 7-18).

It is believed that this case is in condition for an allowance and an early notification of the same is requested. If the Examiner believes that a telephone interview will help further the prosecution of this case, he is respectfully requested to contact the undersigned attorney at the listed telephone number.

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to the Commissioner for Patents, PO Box 1450, Alexandria, VA 22313-1450

By: James Lee

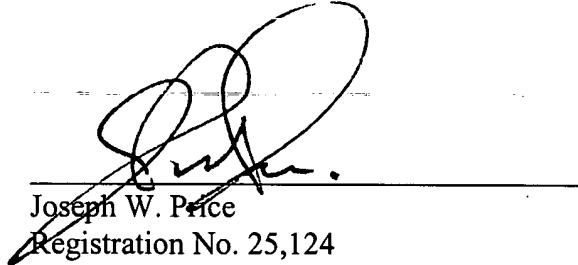


Signature

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Very truly yours,

SNELL & WILMER L.L.P.



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